

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

PAMELA BUTLER, et al.,	)	
	)	
<i>Plaintiffs,</i>	)	Case No. 4:18-cv-01701-AGF
v.	)	
	)	Lead Case
MALLINCKRODT LLC, et al.,	)	
	)	
<i>Defendants.</i>	)	

**MOTION TO CONSOLIDATE BY DEFENDANT COTTER CORPORATION (N.S.L.)**

Defendant Cotter Corporation (N.S.L.) (“Cotter”) respectfully moves for pretrial consolidation of the action *Nikki Steiner Mazzocchio and Angela Steiner Kraus v. Cotter Corp., et al.*, Case No. 4:22-cv-00292-MTS (“*Mazzocchio*”), with these consolidated matters, *Butler v. Mallinckrodt LLC, et al.*, Case No. 4:18-cv-01701-AGF (“*Butler*”). Cotter moves for consolidation under (1) the Price-Anderson Act (“PAA”), 42 U.S.C. § 2210, *et seq.*; (2) Judge Sippel’s Administrative Order Regarding Radionuclide Exposure Claims Against Mallinckrodt LLC and/or Cotter Corporation (N.S.L.) (Oct. 15, 2018), *McChurg v. Mallinckrodt LLC, et al.*, Case No. 4:12-cv-00361-AGF, ECF No. 742 (“Administrative Order”); and (3) and the recent decision of the Eighth Circuit in *In re Cotter Corporation (N.S.L.)*, 22 F.4th 788 (8th Cir. 2022). *See also* Fed. R. Civ. P. 42; E.D. Mo. L.R. 4.03.

Dated: March 17, 2022

Respectfully submitted,

/s/ Brian O. Watson

RILEY SAFER HOLMES & CANCELILA LLP

Brian O. Watson, #68678MO

Lauren E. Jaffe, #6316795IL

Jennifer Steeve, #308082CA

Nacenté Seabury, #67248MO

70 W. Madison St., Ste. 2900

Chicago, Illinois 60602

(312) 471-8700 (main)

(312) 471-8701 (fax)

bwatson@rshc-law.com

ljaffe@rshc-law.com

jsteeve@rshc-law.com

nseabury@rshc-law.com

docketdept@rshc-law.com

**ATTORNEYS FOR DEFENDANT  
COTTER CORPORATION (N.S.L.)**

**CERTIFICATE OF SERVICE**

I certify that on March 17, 2022, these papers were served upon all counsel of record via the Court's electronic filing system.

Respectfully submitted,

/s/ Brian O. Watson

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bwatson@rshc-law.com

ljaffe@rshc-law.com

jsteeve@rshc-law.com

nseabury@rshc-law.com

docketdept@rshc-law.com

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COTTER CORPORATION (N.S.L.)**